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Attorneys for Triumphant Gold Limited

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

| | | |
|------------------------------------|---|--------------------------------|
| IN RE: | § | CHAPTER 11 |
| | § | |
| ROOFTOP GROUP INTERNATIONAL | § | CASE NO. 19-43402-mxm11 |
| PTE. LTD, | § | |
| | § | |
| Debtor. | § | |

**TRIUMPHANT GOLD LIMITED’S WITNESS AND EXHIBIT LIST
REGARDING MATTERS TO BE HEARD ON SEPTEMBER 16, 2019**

[Relates to Dkt No. 44]

Pursuant to Local Rule 9014-1(c), Triumphant Gold Limited (“TGL”) hereby files this Witness and Exhibit List, and designates the following witnesses and exhibits for use in connection with *Motion for an Order (a) Authorizing a Public Auction for the Sale of Certain Assets Free and Clear of All Liens, Claims, and Encumbrances, (B) Approving Procedures for the Solicitation of Bids; (C) Approving the Stalking Horse Bid and Related Bid Protections; (D) Authorizing the Sale of Assets; and (E) Granting Related Relief* [Dkt. No. 44] to be conducted on September 16, 2019 at 9:30 a.m. (the “Hearing”).

WITNESSES

TGL may call the following witnesses to testify at the Hearing whether in person or by affidavit, declaration or proffer:

| <u>No.</u> | <u>Description</u> |
|-------------------|--|
| 1. | Ramesh Pamani by deposition; |
| 2. | Any witnesses called or designated by any other party; |
| 3. | Any witnesses necessary to rebut the testimony of any witness called or designated by another party. |

TGL reserves the right to amend and supplement this witness list.

EXHIBITS

TGL may offer into evidence any one more of the following exhibits¹ at the Hearing:

| <u>TGL No.</u> | <u>Description</u> |
|-----------------------|---|
| 1. | Rooftop Group USA, Inc., JP Morgan Chase Bank, N.A., 2018 Bank Statements (Account No. XXX2495) [Rooftop Singapore_000100-000279] |
| 2. | Rooftop Group USA, Inc., JP Morgan Chase Bank, N.A., Bank Statements for 2019 (Account No. XXX2495) [Rooftop Singapore_000280-000345] |
| 3. | Asian Express Holdings Limited Bank Statements |
| 4. | August 1, 2019 Hearing Transcript |
| 5. | Rooftop International Pte. Ltd 30(b)(6) Deposition Transcript dated July 19, 2019 [TGL_000407-629] |
| 6. | Rooftop Group International Pte. Ltd. First Meeting of Creditors Transcript dated June 7, 2019 [TGL_000002-94] |

¹ Each exhibit listed includes any attachments or exhibits thereto, unless otherwise noted herein.

| <u>TGL No.</u> | <u>Description</u> |
|---------------------------|---|
| 7. | (a) Trademark License Agreement dated February 14, 2019 between Rooftop Group International Ptd. Ltd., and AMAX Industrial Group China Co. Ltd. [Rooftop Singapore_000430-000438] (b) AMAX Side Letter dated February 24, 2019 [Rooftop Singapore_000439-000440] |
| 8. | Ramesh Pamani Deposition Transcript dated September 10, 2019 |
| 9. | Declaration of Fernando Torres |
| 10. | Transfer Worksheet [Rooftop Singapore_000099-000099] |
| 11. | Rooftop Group International Investor Presentation Appendices Spring 2018 [Rooftop Singapore_000025-000035] |
| 12. | Any exhibits designated by any other party |

TGL reserves the right to amend and supplement this exhibit list.

RESERVATION OF RIGHTS

The foregoing witness and exhibit list is being submitted based on information reasonably available to TGL at this time and without waiving any objection as to relevance, materiality, or admissibility of evidence in this litigation. TGL reserves the right to ask the Court to take judicial notice of pleadings, transcripts, and/or other documents, and to supplement or amend this Witness and Exhibit List at any time before the Hearing.

Dated: September 13, 2019

Respectfully submitted,

/s/ Katharine Battaia Clark

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**ATTORNEYS FOR TRIUMPHANT
GOLD LIMITED**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument has been served electronically via the Court's ECF noticing system on those parties who receive notice from that system on the 13th day of September, 2019 via electronic mail.

/s/ Katharine Battaia Clark

Katharine Battaia Clark